Message

From: ORCRMeasurement [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D96BE59DBBB54C8EA98858818A75CC9B-ORC MEASURE]
Sent: 10/22/2020 10:37:16 PM
To: heather@zerowastewashington.org; ORCRMeasurement [ORCRMeasurement@epa.gov]
CC: heather@zerowastewashington.org
Subject: RE: Zero Waste Washington comments on U.S. National Recycling Goals

Dear Ms. Trim:

Thank you for your thoughtful feedback on the America Recycles National Recycling Goals to the Environmental Protection Agency (EPA). Comments received will be made publicly available in Regulations.Gov by searching EPA-HQ-OLEM-2020-0443.

EPA will use the feedback received to inform the selection of the metrics to become as national recycling goals. EPA will announce these goals at the America Recycles Summit on November 17, 2020. In 2021, the Agency will develop the appropriate methodologies and set numerical targets and baselines for the chosen goals. We appreciate your interest and dedication to improving the U.S. recycling system and invite U.S.-based organizations join the national dialogue to work toward a more resilient materials economy. By signing the America Recycles Pledge, you are signifying your interest to participate in ongoing dialogues and to take action with other pledge signers to improve America's recycling system.

Sincerely,
EPA's Materials Measurement Team

From: heather@zerowastewashington.org <heather@zerowastewashington.org>
Sent: Friday, October 02, 2020 10:24 PM
To: ORCRMeasurement <ORCRMeasurement@epa.gov>
Cc: heather@zerowastewashington.org
Subject: Zero Waste Washington comments on U.S. National Recycling Goals

EPA Office of Resource Conservation and Recovery
1200 Pennsylvania Avenue, N. W.
MC 5305P
Washington, D.C. 20460
Via email: ORCRMeasurement@epa.gov

RE: U.S. National Recycling Goals

To the National Recycling Goal committee:

Zero Waste Washington appreciates the opportunity to comment on the United States Environmental Protection Agency proposed ***U.S. National Recycling Goals***, made public in September 2020. The metrics are organized in four areas: System-Wide Recycling Measures to Assess Recycling Performance, Reducing Contamination in the Recycling Stream, Increasing Materials Processing Efficiency, and Strengthening Markets for Recycled Materials.

Zero Waste Washington is a nonprofit organization that represents the public on recycling and zero waste issues. We work to drive policy change for a healthy and waste-free world. We envision a just, equitable, and sustainable future where we all produce, consume, and reuse responsibly.

We strongly support reducing waste first and for the remaining material a circular economy system that responsibly recycles items into new high quality, safe items.

Our comments follow:

Category 1

System-Wide Recycling Measures to Assess Recycling Performance

A stronger, more resilient U.S. recycling system is a critical component in reducing the environmental impacts of materials across their lifecycle. Improvement of the U.S. recycling rate, access rate, participation rate, job creation, capture rate and tonnage of recyclables landfilled are needed for a more robust recycling system. Investment and innovation are necessary to strengthen the U.S. recycling system and support industry-wide job creation. Below are metrics that are under consideration to assess the system-wide performance of recycling.

- *Recycling Rate: The percentage of the total amount of discarded or used materials generated that are utilized as feedstock for the manufacture of new products.*
- *Recycling Access Rate: The percentage of households that have access to recycling on par with trash collection services.*
- *Participation Rate: The percentage of eligible users regularly using a recycling service.*
- *Recycling Jobs: The number of jobs supported directly and indirectly by the recycling industry, including upstream supply chain economic activities.*
- *Capture Rate: The percentage of recyclable material generated that are recycled.*
- *Recyclables Landfilled: The tonnage of recyclable materials landfilled.*

1. **Toxic chemicals.** We recommend that the metrics be amended to ensure that the recycling that counts under a recycling goal be that which does not transfer toxic chemicals into new products or packaging. For example:

   "Recycling Rate: The percentage of the total amount of discarded or used materials generated that are utilized as toxic-free feedstock for the manufacture of new products."

2. **Organic Materials.** We recommend that you include organic materials in all categories. This is key to helping address waste reduction overall and strengthening the recycling system for the other commodities (plastic, metal, glass, paper, etc.) because it will help remove residual food waste on those materials and clean up the system overall. In addition, on its own merit, organic material is important to address as we move towards a zero waste future.

3. **Reuse.** As major companies move to more reuse options, including the rapidly expanding Loop program, we recommend that reuse metrics be included in the new goals. These may be low targets at the moment, but public sentiment and the sustainability goals of manufacturers are shifting towards more reuse and it would be great to capture this now as you collect baseline data.

4. **Other sectors**. We recommend that the recycling metrics (and similar for the other categories below) be broadened to include all sectors – commercial, industrial, etc. - not just residential.

5. **Chemical recycling.** Technologies such as chemical recycling should not be included as "recycling" if the material is being processed into fuel or if the process requires large amounts of energy or emits pollutants.

6. **True recycling.** We recommend that the metrics only include material that is genuinely recycled into new products or packaging. For example:

   "Capture Rate: The percentage of recyclable material generated that are recycled into new products or packaging."

Category 2

Reducing Contamination in the Recycling Stream

Contamination negatively affects the ability of a material recovery facility (MRF) or secondary processing facility to produce high-quality, clean recycled materials that can serve as feedstock for new materials and products. Contamination occurs at multiple points including curbside, in-bound and out-bound and in residuals. Below are metrics expressed as a percentage that could be used to assess contamination.

- *Curbside Contamination: The percentage of materials that residents place in their recycling collection that are not accepted in their curbside program or acceptable materials that have high amounts of residue.*
- *MRF In-Bound Contamination: The percentage of materials arriving at the MRF that are not accepted by the facility or acceptable materials that have high amounts of residue.*
- *Recycled Commodity Contamination: The percentage of contaminants in out-bound recycled commodity materials such as paper, plastic, glass and metals.*
- *Residual Rate: The percentage of materials coming out of the MRF that are sent to combustion facilities or landfills.*

1. **Pulp and other residuals.** In additional to residuals that are produced at MRFs, it would be good to also include the residuals generated at the processors (which is reflective of the contamination that they receive in their feedstock). Pulp and paper mills have quality data, for example, about their residuals. Compost facilities do, as well.

2. **Other source contamination.** In addition to adding contamination rate for commercial and industrial sectors, it would be helpful if you also included contamination at drop-off or depot locations.

Category 3

Increasing Materials Processing Efficiency

Recycling infrastructure in the U.S. has not kept pace with the evolving recyclables stream. Investment and innovation are needed to increase the efficiency of materials processing infrastructure and create a more resilient recycling system. Examples of efficiencies that can be attained through additional investment include improving the capacity utilization rate, decreasing the cost of sorting recyclable materials and increasing the percentage of recyclable materials post-sort compared to the amount of recyclables entering the MRF. Below are metrics that could be used to assess materials process efficiency.

- *Capacity Utilization Rate: The total tonnage of materials processed by MRFs as compared to the total tonnage of materials that MRFs are capable of processing.*
- *Processing Cost: The per-ton operating and capital costs for MRFs to receive, separate and prepare recyclable materials for end-user markets.*

- *Processing Yield: The percentage of materials recovered by a MRF or secondary processing facility compared to the incoming materials.*

1. **Capacity versus need.** These metrics would be useful if they were broadened to include a metric of the need (i.e., the amount of capacity needed as we increase overall recycling rates), including for organic materials.

Category 4

Strengthening Markets for Recycled Materials

There is a need to improve domestic markets for recyclable materials and recyclable products, as well as to better integrate recycled materials into products and packaging designs. Policies, programs, initiatives and incentives should focus on recycled content and materials with less mature markets. Strengthening markets for recycled materials will provide local jobs, add resiliency to market disruptions and create cost savings for local municipalities. Below are metrics that could be used to assess markets for recycled materials.

- *Recycled Commodity Quality: The quality of post-processed recycled materials marketed for manufacture based on standard industry specifications.*
- *Domestic Utilization: The percentage of recycled materials used domestically as compared to the amount exported.*
- *Recycled Content: The percentage of recycled content within manufactured goods.*
- *Commodity Value: The average per-ton value of post-processed recycled materials.*

1. **OECD.** We recommend that the Domestic Utilization metric be expanded to include also the amount of material that is exported to the Organisation for Economic Co-operation and Development (OECD) member nations, so that the public can assess the degree of responsible downstream standards.

2. **Post-consumer content.** We recommend that a metric be added to assess percentage of post-consumer content in manufacture goods, by material.

Thank you for consideration of our comments. I can be reached at heather@zerowastewashington.org or (206) 441-1790.

Sincerely,

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Executive Director

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